

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

MOMODOU TAAL, MÜKOMA WA NGÜGĨ,
and SRIRAM PARASURAMA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; and KRISTI NOEM, in her official capacity as Secretary of the U.S. Department of Homeland Security;

Defendants.

NOTICE OF MOTION

Civil Action No. 3:25-cv-335 (EEC/ML)

PLEASE TAKE NOTICE that, upon the Complaint and the exhibits attached thereto, the accompanying memorandum of law, and all other pleadings and proceedings in this action, Plaintiffs, by and through undersigned counsel, will move that this court enjoin Defendants Donald Trump, the Department of Homeland Security (“DHS”), and DHS Secretary Kristi Noem from enforcing two executive orders – Exec. Order No. 14161, “Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats,” 90 Fed. Reg. 8847 (Jan. 30, 2025), (“EO 1”), and Exec. Order No. 14188, “Additional Measures to Combat Anti-Semitism,” 90 Fed. Reg. 8451 (Feb. 3, 2025), (“EO 2”), at least in part, and requesting any other relief that the Court deems just and proper.

Dated: March 15, 2025

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Respectfully submitted,

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**pro hac vice* forthcoming
†admission pending